

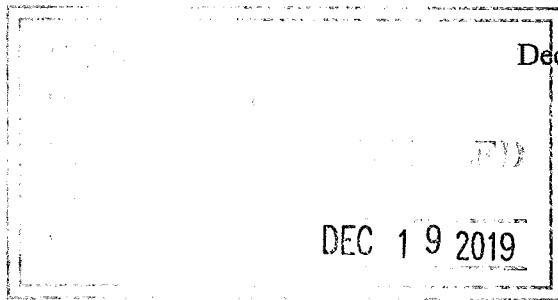


DEREK SMITH
LAW GROUP, PLLC
Employment Lawyers Representing Employees Exclusively

VIA ECF

Honorable Alison J. Nathan
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York

December 16, 2019



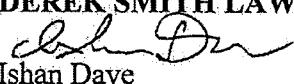
Re: *Mohamed Farghaly v. Potamkin Cadillac-Buick-Chevrolet-Geo, Ltd., et al.*
Civil Action No. 18-cv-11106 (AJN)

Dear Judge Nathan:

Our office represents Plaintiff Mohamed Farghaly in the above-referenced matter. Fact discovery is currently scheduled to close on December 16, 2019. Pursuant to Section 1(D) of Your Honor's Individual practices, we write jointly with Defendants' counsel to respectfully request a sixty (60) day stay of discovery, until February 14, 2020, pending a private mediation, as well as a 60 day extension of the close of expert discovery from January 29, 2020, to March 29, 2020.

The parties continue to work cooperatively in discovery and have now completed all anticipated depositions. There is minimal paper discovery left to be completed, and the parties are in the process of confirming mediation details and scheduling a private mediation to hopefully resolve the matter.

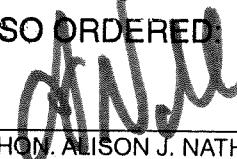
Accordingly, we respectfully request a sixty (60) day stay of discovery, until February 14, 2020, pending a private mediation, as well as a 60 day extension of the close of expert discovery from January 29, 2020, to March 29, 2020.

Respectfully submitted,
DEREK SMITH LAW GROUP, PLLC

Ishan Dave

cc: all Parties via ECF

The request for a stay and extension of discovery is hereby GRANTED. Discovery is stayed until February 14, 2020, and the close of expert discovery is extended to March 29, 2020. The case management conference currently scheduled for January 17, 2020 is adjourned to March 13, 2020 at 4:00 p.m. No further extensions will be granted.
SO ORDERED.

12/18/19
SO ORDERED


HON. ALISON J. NATHAN
UNITED STATES DISTRICT JUDGE